

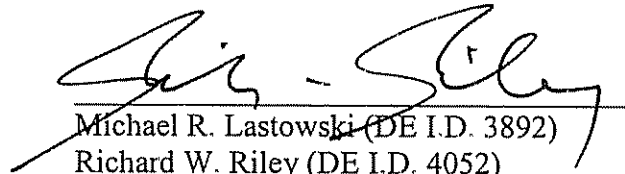
words "Operating Company, LLC". For example, the first pages of Exhibit "A" demonstrate the qualification in Missouri of a Delaware limited liability company created on March 22, 2005, named "4700 NW Cliff View Drive Operating Company, LLC". 4700 Cliff View Drive is the address, in Kansas City, MO, of the first-named plaintiff in this action. The other pages of Exhibit "A" deals with other entities recently created, with the respective street addresses of several of the other properties in question.

3. Plaintiffs are aware of at least one property for which the new entity has obtained from the State regulatory authorities the forms necessary for an application for change in ownership of the nursing home property.

4. So much for defendant's spurious evidence of its "solvency". The Motion should therefore be in all respects granted.

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Wilmington, Delaware

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